Tannenbaum Helpern Syracuse & Hirschtritt LLP

900 Third Avenue New York, NY 10022-4775
Tel: (212) 508-6700 | Fax: (212) 371-1084
www.thsh.com | @THSHLAW

Elizabeth E. Schlissel
Direct Dial: (212) 508-6714
Schlissel@thsh.com

March 29, 2019

VIA ECF

Hon. Edgar Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

> RE: *Haddoumi, et al v. Ambiance Wine LLC et al*, **18-cv-08651 (ER)**
>   **Response to Plaintiffs' March 25, 2019 Letter**

Dear Judge Ramos:

We represent defendants Ambiance Wine LLC d/b/a Vella Wine Bar ("Vella Wine Bar"), Evgenia Huldisch and Vladislav ("Billy") Karasik (collectively "Defendants") in the above referenced action. This letter is submitted in response to Plaintiffs' March 25, 2019 letter motion for a Court Order either ordering my clients' to execute the settlement agreement or ordering the parties to appear in-person at a conference to address my clients' failure to sign the agreement.

On February 14, 2019, the parties participated in a mediation session that resulted in a settlement that was memorialized in a term sheet. Thereafter, the parties drafted and negotiated a written settlement agreement. The parties agreed to the final terms of the written settlement agreement on March 19, 2019. Throughout the last ten days, my firm has reached out to our clients several times in an attempt to procure their signatures on the written settlement agreement. Today, Mr. Karasik informed me that his wife, defendant Evgenia Huldisch, is currently in the hospital and that is the reason why they have not yet signed the settlement agreement. This afternoon, Mr. Karasik sent me his signature on the settlement agreement. I am still waiting for the signatures on behalf of the company and Evgenia Huldisch's signatures.

In light of Mr. Karasik's representations, I respectfully request that my clients have until April 5, 2019 to complete their signatures on the settlement agreement.

Thank you for your consideration.

Respectfully submitted,

Elizabeth E. Schlissel

cc: All Counsel of Record
       (Via ECF)

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